

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 08 C 1720</b>
	)	
<b>v.</b>	)	
	)	<b>Judge Rebecca Pallmeyer</b>
	)	<b>Magistrate Judge Nolan</b>
<b>CHATEAU DEL MAR, INC. and HICKORY HILLS PROPERTIES, INC.</b>	)	
	)	<b>JURY TRIAL DEMANDED</b>
<b>Defendants.</b>	)	
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	)	
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**JOINT REPORT OF PARTIES PLANNING MEETING**

1.     **Meeting:** Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on August 22, 2008 and was attended by June Wallace Calhoun, 500 West Madison Street, Suite 2000, Chicago, Illinois 60661 (312) 353-7259, having appeared as counsel for Plaintiff EEOC, Michael Lee Tinaglia, 9700 West Higgins Road, Suite 1015, Rosemont, IL 60018 (847) 692-0421, and Thomas Paris 50 West Monroe, Suite 3950, Chicago, IL 60603 (312) 759-1600, having appeared as counsel for Defendants Chateau Del Mar, Inc. and Hickory Hills Properties, Inc. (collectively referred to as “Defendants”).

2.     **Pre-trial Schedule:** The parties jointly propose to the Court the following discovery plan:

a.     Discovery will be needed on the following subjects: (1) Whether or not Defendants discriminated against Charging Parties Joan Knable (“Knable”), Jill Raddatz (“Raddatz”), Karen Curry (“Curry”), and Maria Rodriguez (“Rodriguez”) (collectively, “the

Chateau CPs”), and a class of female employees by subjecting them to harassment because of their sex; (2) Whether or not Defendants retaliated against the Chateau CPs and a class of female employees by subjecting them to continuing sexual and gender-based harassment after they opposed and made complaints about the hostile work environment; (3) Whether or not Defendants retaliated against Knable, Raddatz, Curry and a class of female employees by terminating their employment for having opposed and made complaints about the hostile work environment; (4) Whether or not Defendants constructively discharged Rodriguez and a class of female employees as a result of the sexual harassment; (5) Whether or not Defendant Hickory Hill Properties, Inc. (“Hickory Properties”) discriminated against Charging Parties Ronda Adamek (“Adamek”) and Lisa Buglio (“Buglio”) (collectively, “the Hickory Hills CPs”), and a class of female employees by subjecting them to harassment because of their sex; (6) Whether or not Defendants retaliated against the Hickory Hills CPs and a class of female employees by subjecting them to continuing sexual and gender-based harassment after they opposed and made complaints about the hostile work environment; (7) Whether or not Defendants constructively discharged the Hickory Hills CPs and a class of female employees as a result of the sexual harassment; (8) Whether or not Defendants discriminated against a class of African American employees by subjecting them to different terms and conditions of employment, including termination, because of their race; (9) Whether or not Defendants discriminated against a class of African American applicants for employment by failing to hire them because of their race; (10) What damages, if any, Knable, Curry, Raddatz, Rodriguez, Adamek, Buglio, the class of female employees and the class of African-American applicants and employees are entitled to receive; and (11) Any and all affirmative defenses raised by Defendants in their Answer to EEOC’s First Amended Complaint.

b. Disclosures pursuant to Fed. R. Civ. P 26 (a)(1) were made by August 11, 2008. All discovery to be commenced in time to be completed by May 30, 2009.

c. Plaintiff EEOC's investigation continues with respect to identifying its classes of female and African-American applicants and employees. Consequently, the parties agree that placing a limitation on the number of fact witnesses is premature at this time.

d. To date, the parties have not determined if they will use expert witnesses. In the event that the parties decide to use experts, reports from retained experts under Rule 26(a)(2) should be due from Plaintiffs by February 28, 2009; and from Defendants by March 28, 2009. Expert witness discovery to close on May 30, 2009.

e. Parties should be allowed until November 28, 2008, to join additional parties and to amend the pleadings.

f. All potentially dispositive motions should be filed by June 30, 2009.

g. Plaintiffs to prepare proposed draft of the Final Pretrial Order 30 days after the Court's ruling on any dispositive motions; parties to file joint Final Pretrial Order 14 days thereafter.

h. The case should be ready for trial 14 days after submission of the Final Pretrial Order, and at this time is expected to take approximately 10 days.

3. **Settlement.** Plaintiff EEOC is unable to make a settlement demand at this time, as EEOC has not yet been able to identify all of its class members.

4. **Consent.** The parties do not agree that this case may be tried by the assigned Magistrate Judge.

Dated: August 25, 2008

Respectfully submitted,

U.S. Equal Employment Opportunity Commission  
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**CERTIFICATE OF SERVICE**

I, June Wallace Calhoun, an attorney certify that I caused a copy of the foregoing ***Joint Report of Parties Planning Meeting*** to be served upon the following individuals via electronic filing on the 25<sup>th</sup> day of August 2008:

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